



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case No. 03-CV-9849 (S.D.N.Y.)
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 1:02-6977 (S.D.N.Y.)
Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)
Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)
New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)
World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)

AFFIDAVIT OF MUSA DAWOUD MUSA MUSTAFA

I, Musa Dawoud Musa Mustafa, state under penalty of perjury as follows:

1. I was born in Jerusalem in 1946 and am a citizen of Jordan. I currently live in the United Arab Emirates.
2. As an employee of the Public Buildings & Airports Division ("PBAD") of the Saudi Binladin Group ("SBG"), I was the project manager for executing and constructing the New Port Sudan Airport in the Sudan. The Mohammed Binladin Company ("MBC") did not work on the New Port Sudan Airport project as a subcontractor or otherwise.
3. To the best of my knowledge, neither Osama Bin Laden nor Al Hijra for Construction and Development had any role in the construction of the New Port Sudan Airport. Osama Bin Laden was not employed by, and did not provide any assistance to, SBG on the


project. Likewise, Al Hijra for Construction and Development was not retained as a contractor or in any other capacity on the project. My only contact with Osama Bin Laden regarding the New Port Sudan Airport project occurred when, on a couple of occasions, he accompanied Sudanese government officials on tours of the airport construction site.

4. The New Port Sudan Airport project was substantially completed by mid-1992 and an inauguration ceremony was held at the airport on June 24, 1992. To the best of my memory, Osama Bin Laden did not attend the inauguration and there was no mention of him during the ceremony. Attached as Exhibit 1 is an article from the June 25, 1992 edition of the Okaz newspaper reporting on the inauguration of the New Port Sudan Airport on the previous day. I am in the photograph at the bottom center of the article. Osama is not referenced in the article nor is he pictured in any of the photographs.

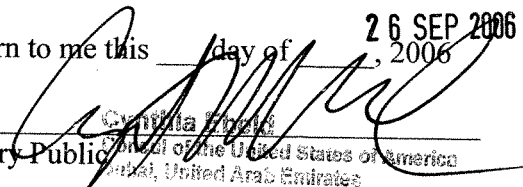
5. I left the Sudan not long after the inauguration ceremony, as my assignment as project manager for the Port Sudan Airport was substantially completed. The Port Sudan Airport project was the only project I ever worked on for SBG in the Sudan, and I am not aware of any other projects that SBG or MBC or any of their affiliates undertook in the Sudan prior to 1995, when I left SBG.

6. While working on the New Port Sudan Airport project, I made occasional trips to Khartoum to attend meetings with the Sudanese Civil Aviation Authority regarding the project. During one such trip to Khartoum, I had a brief contact with Osama Bin Laden, which led to an invitation to take a short tour of a portion of the proposed site for the construction of a road (which I later heard was called the Tahaddi Road) with an engineer working with Osama Bin Laden. My visit to the area of the proposed road was unrelated to the New Port Sudan Airport project. I had no other contacts with Osama Bin Laden or anyone else regarding the road.

7. During the period I was working on the New Port Sudan Airport project, I had absolutely no knowledge of any ties between Osama Bin Laden and terrorist activities or any terrorist organization.



Musa Dawoud Musa Mustafa

Sworn to me this 26 day of SEP, 2006


Notary Public, State of the United States of America
Dubai, United Arab Emirates
My Commission Expires INDEFINITELY